

Exhibit 3

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July 17, 2015

The Honorable Jesse M. Furman
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: In re: General Motors LLC Ignition Switch Litigation,
14-MD-2543 (JMF)**

Dear Judge Furman:

Pursuant to this Court's Order No. 8 § V, Lead and Liaison Counsel and counsel for General Motors LLC ("New GM") submit this joint written update to advise the Court of matters of possible significance in proceedings related to MDL 2543.

First, on July 15, 2015, over New GM's objection, plaintiffs' lead counsel in the Texas MDL submitted a "joint" status letter to the Honorable Robert Schaffer, requesting a trial date in February 2016. New GM did not agree to plaintiffs' submission and submitted a letter to Judge Schaffer in response. Plaintiffs' lead counsel submitted a letter in reply. Copies of the parties' letters are attached hereto as Exhibits 1-3, respectively.

Second, on July 6, 2015, the Honorable Thomas Bedell entered the MDL 2543 Coordination Order ("Coordination Order") in *Clark (William), et al. v. General Motors LLC, et al.*, No. 15-C-134-2, (Harrison County, W.Va.), a personal injury action alleging ignition switch defects in a 2010 Chevrolet Impala. A copy of the order is attached hereto as Exhibit 4.

Third, New GM has filed opposed motions for entry of the Coordination Order in five Related Actions, which were the subject of the parties' July 2, 2015 joint letter to the Court (*see* Doc. No. 1120): *Bernard, et al. v. Schnittker, et al.*, No. 13-CI-00098 (Estill County, Ky.); *Colarossi v. General Motors LLC, et al.*, No. 14-22445 (Suffolk County, N.Y.); *Lucas v. General Motors LLC, et al.*, No. 15-CI-00033 (Perry County, Ky.); *Petrocelli v. General Motors LLC, et al.*, No. 14-17405 (Suffolk County, N.Y.); and *Quiles v. Catsoulis, et al.*, No. 702871/14 (Queens County, N.Y.). Copies of the motions are attached hereto as Exhibits 5-9, respectively.

Fourth, on July 7, 2015, New GM and plaintiffs filed a joint stipulation for continuance of the original July 13, 2015 trial date in *Polanco, et al. v. General Motors LLC, et al.*, No.

KIRKLAND & ELLIS LLP

The Honorable Jesse M. Furman
July 17, 2015
Page 2

CIVRS 1200622 (San Bernardino County, Cal.), which was a subject of the parties' June 19, 2015 joint letter to the Court (*see* Doc. No. 1056). A copy of the as-entered stipulation is attached hereto as Exhibit 10. The new trial date that has been set is September 19, 2016.

Fifth, on July 7, 2015, the Honorable Michael Garrett entered the Coordination Order in *Grant (Charon) v. General Motors LLC, et al.*, No. 2014CV02570MG (Clayton County, Ga.), a personal injury action alleging ignition switch defects in a 2004 Cadillac SRX. A copy of the order is attached hereto as Exhibit 11.

Sixth, on July 10, 2015, plaintiffs in *Felix, et al. v. General Motors LLC*, No. 1422-CC09472 (City of St. Louis, Mo.), served New GM cross-notice of deposition for two pending MDL deponents, although the notices do not specify dates for such depositions. Copies of the notices are attached hereto as Exhibits 12–13. The *Felix* plaintiffs continue to receive access to the MDL Document Depository and opportunities to participate in MDL depositions. New GM will update the Court promptly of any developments in *Felix*, including whether this Court's assistance will be necessary.

Seventh, on July 10, 2015, New GM filed a motion to transfer venue in *Shell, et al. v. Gen. Motors LLC*, No. 1522-CC00346 (City of St. Louis, Mo.), a wrongful death and personal injury action alleging ignition switch defects in accidents involving two deaths and twenty-eight personal injuries. A copy of New GM's motion is attached hereto as Exhibit 14.

Eighth, July 15, 2015, New GM and plaintiffs in *Fuselier v. Gen. Motors LLC*, No. 128349-C (St. Mary Parish, La.), a personal injury action alleging ignition switch defects in a 2005 Chevrolet Cobalt, submitted a joint request to adopt the Coordination Order. A copy of the parties' submission is attached hereto as Exhibit 15.

Ninth, on July 17, 2015, plaintiffs in *Ibarra v. General Motors LLC, et al.* No. CJ-2014-01391 (Tulsa County, Okla.), an unrelated wrongful death action alleging airbag, seat belt, and structural defects in 2006 Chevrolet Impala, filed a combined motion to compel and motion for reconsideration of the court's order sustaining New GM's objection to plaintiffs' corporate representative deposition notice. The motion was filed in response to questioning at the deposition of New GM employee Kathy Anderson, a noticed MDL witness, directly concerning issues related to the ignition switch. New GM intends to respond to the motion to compel and promptly file a motion for adoption of the Coordination Order. Copies of plaintiffs' motion and the court's order are attached hereto as Exhibits 16-17, respectively.

Tenth, the following filings were made and orders entered related to proceedings in the Bankruptcy Court since the parties' July 2, 2015 joint letter to the Court (*see* Doc. No. 1120):

KIRKLAND & ELLIS LLP

The Honorable Jesse M. Furman
July 17, 2015
Page 3

- July 6, 2015: New GM filed with the Bankruptcy Court (i) a response to a No Stay Pleading filed by the *Hailes* Plaintiffs, and (ii) a response to the *Bledsoe* Plaintiffs' Motion to Amend and No Stay/No Strike/Objection Pleading. Also, Plaintiff in *Phillips v. General Motors LLC* filed a notice of appeal of the Bankruptcy Court's Judgment dated June 1, 2015, and its April 15, 2015 Decision, as well as the Bankruptcy Court's *Order on Motion for 60(B) Relief (Doris Phillips)*, dated June 29, 2015 and its *Decision on Motion for 60(B) Relief (Doris Phillips)*, dated June 8, 2015.
- July 7, 2015: The Bankruptcy Court entered a Memorandum Endorsed Order respecting the No Stay Pleading filed by the *Hailes* Plaintiffs.
- July 9, 2015: New GM filed an Omnibus Response to Benjamin Pillars' Objection Pleading and a No Dismissal Pleading. In addition, the following pleadings were filed with the Second Circuit in connection with the appeal of the June 1, 2015 Judgment: (i) *Elliott* Petitioners' Reply to Wilmington Trust Company's Response to Their Petition for Permission to Appeal, (ii) *Elliott* Petitioners' Response and Reply to Certain Plaintiffs' Motion for Leave to Intervene and to Respond to the Petition, (iii) *Elliott* Petitioners' Reply to General Motors LLC's Response to Their Petition for Permission to Appeal; and (iv) Motion For Leave To Intervene In Appeal And To Respond To Cross-Petitioner's Petition For Permission To Appeal.
- July 10, 2015: New GM filed with the Bankruptcy Court (i) an Omnibus Response to the No Strike Pleadings filed by the States of Arizona and California, and (ii) a Motion to Enforce the Stay Imposed by the Judgment, dated June 1, 2015 against the States and Plaintiffs Represented by Designated Counsel. Also, Plaintiff in *Phillips v. General Motors LLC* filed a second notice of appeal of the Bankruptcy Court's *Order on Motion for 60(B) Relief (Doris Phillips)*, dated June 29, 2015 and its *Decision on Motion for 60(B) Relief (Doris Phillips)*, dated June 8, 2015 (there was no reference to the June 1, 2015 Judgment or the April 15, 2015 Decision in this notice of appeal).
- July 13, 2015: The Bankruptcy Court entered an Errata Order with respect to its Decision on Motion to Enforce Sale Order, dated April 15, 2015.
- July 14, 2015: The Bankruptcy Court so-ordered a Stipulation and Order ("Stipulation and Order") regarding New GM's Motion to Strike Certain Documents Contained in Appellants' Designation of Items to Be Included in the Record on Appeal. Designated Counsel filed Appellants' Statement of Issues on Appeal and Amended Designation of Items to be Included in the Record on Appeal. Also, New GM filed its Response to the No Strike Motion filed by Dolly Walton. And, in connection with the Stipulation and

KIRKLAND & ELLIS LLP

The Honorable Jesse M. Furman
July 17, 2015
Page 4

Order, Designated Counsel filed with the Bankruptcy Court their Corrected Appellants' Statement of Issues on Appeal and Amended Designation of Items to be Included in the Record on Appeal.

Copies of the foregoing documents are attached hereto as Exhibits 18-34, respectively.

Eleventh, pursuant to Order No. 1 § X.8, the Defendants' July 21, 2014 Status Letter (Doc. No. 73) included an Exhibit A listing cases consolidated to date in MDL 2543, as well as an Exhibit B listing related cases pending in state and federal court, together with their current status. For the Court's convenience, updated versions of Exhibits A and B are attached hereto as Exhibit 35.

Finally, the parties continue to work to ensure that the Court is provided with current and correct contact information for presiding judges in actions listed in the aforementioned Exhibit B. To that end, the Federal/State Liaison Counsel intends to shortly submit to the Court updates, if any, to the e-mail addresses of the presiding judges in Related Actions.

Respectfully submitted,

/s/ Richard C. Godfrey, P.C.

/s/ Andrew B. Bloomer, P.C.

Counsel for Defendant General Motors LLC

cc: The Honorable Robert E. Gerber
Lead Counsel for Plaintiffs
Federal/State Liaison Counsel
Plaintiff Liaison Counsel
Counsel of Record for Defendants